

# TEXAS WATER COMMISSION

Paul Hopkins, Chairman  
John O. Houchins, Commissioner  
B. J. Wynne, III, Commissioner



Allen Beinke, Executive Director

J. D. Head, General Counsel  
Michael E. Field, Chief Examiner  
Karen A. Phillips, Chief Clerk

March 8, 1988

Mr. James Pendergast, P.E.  
U.S. Environmental Protection Agency  
Region VI  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Re: South Cavalcade Draft  
RI Report

Dear Mr. Pendergast:

I have reviewed portions of the draft RI report for this site. I have not reviewed volumes II & III which contains the appendices. I appreciated receiving a copy of your comments, however the attachment we received contained comments on the executive summary, Section 9 and the Toxicological Profiles applicable to the Koppers Texarkana Site. If I am missing any of your comments on these areas for South Cavalcade, please forward them. I do not have any additional comments beyond what you have identified.

Regarding the preliminary public health and environmental assessment, the exposure pathway for trespassers is not considered complete because a fence prevents entry to the surface and surficial soils. Until a substantial security fence is installed and maintained, the elimination of this exposure is questionable considering the propensity for teenage youth to violate such a boundary.

In addition, the TWC supports the hypothetical exposure scenarios retained by Koppers for utility workers and future installations of domestic wells. These are valid and important exposure routes which should be considered.

Sincerely,

A handwritten signature in cursive script, appearing to read "JHBrown".

Joseph H. Brown  
Remedial Investigation Unit  
Superfund Section  
Hazardous and Solid Waste Division

006301

131